Message

From: Donovan, Betsy [/O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=1075D24015DB49549A456BC334BD9C25-DONOVAN, BETSY]
Sent: 8/30/2017 9:25:01 PM
To: Hagerman, Paul [HagermanPR@cdmsmith.com]
CC: Darpinian, Amy F NWK (Amy.F.Darpinian@usace.army.mil) [Amy.F.Darpinian@usace.army.mil]
Subject: RE: Rolling Knolls - proposed agenda for August 31 meeting

Thanks Paul. Your feedback is very much appreciated. See you tomorrow.

From: Hagerman, Paul [mailto:HagermanPR@cdmsmith.com]
Sent: Wednesday, August 30, 2017 5:12 PM
To: Donovan, Betsy <Donovan.Betsy@epa.gov>
Cc: Darpinian, Amy F NWK (Amy.F.Darpinian@usace.army.mil) <Amy.F.Darpinian@usace.army.mil>
Subject: RE: Rolling Knolls - proposed agenda for August 31 meeting

We also looked at General Comment #1, and I have some thoughts to share there (pasted below). Yes, they raised questions on the choice of language and issues raised, but this wording is used by them in their own report, as noted. I wonder if the response to comments weren't revised by the PRP lawyers who had not remembered what was in the actual RI report.

Why are these considered source areas?
Section 4.1 of the RI report discusses potential sources, specifically, the RI report stated "**The landfill waste material is a potential source of constituents to environmental media.**"

There are very little VOCs in soil.
Section 4.2.1 discussed test pit samples. The first full paragraph on page 60 discussed chemicals found at TP-09, which includes visible oily sheen and PID reading of 839 ppm; VOCs detected included BTEX and chlorinated solvents, with benzene at 20 mg/kg and TCE at 30 mg/kg. SVOC detected was 2-methylphenol at 410 mg/kg. The TIC as mephenesin was at 78,000 mg/kg (i.e. 7.8% concentration). Aroclor 1254 was detected at 310 mg/kg. Other waste materials were also detected in other test pits and POIs.

The extent of contamination in these areas has not been evaluated during the RI, so it can't be discussed in any detail.
In the first paragraph of the ES, it stated "The purpose of the RIR is to present the Site characterization data collected **to characterize the nature and extent of hazardous substances in environmental media at the Site**, and the risks associated with exposure to the hazardous substances." Based on the objective established, the RI report should discuss the extent of contamination in these potential source areas.

What data indicate that constituents from these areas have impacted groundwater?
On page xx of the ES, the RI report stated "Four areas of impacted groundwater were identified in this zone [shallow water-bearing zone]. These include: benzene and 1,4-dioxane in the southern part of the landfill. ....Freon compounds in the northern portion of the landfill and the Surface Debris Area. ....PCBs at monitoring well MW-7.....Benzene at monitoring well MW-19 near the southeastern boundary of the landfill...."

Similarly, it is not accurate to say pesticides are wide spread.
On page xix of the ES, the RI report stated "Surface and subsurface soil impacts were identified across the landfill, including semivolatile organic compounds, polychlorinated biphenyls, **pesticides** and inorganic constituents (e.g., metals). In general, **the constituents are widespread** and...."

How does USEPA define "relatively high concentrations"? I know you have an approach in mind already, but if they are looking for definitions, a conservative way to define relatively high concentration is anything above ARARs or greater than 10^-6 risk

Introducing the idea of achieving higher overall risk reduction can lead to many more questions about what that risk reduction is based on, and what scenarios we are addressing. This can be addressed more clearly and completely in the FS, when we have approved ARSs and the final risk approach to PCBs.

How is relatively high defined? We are proposing ARSs to NJDEP, and compared to the ARSs these concentrations are not that high. That will be addressed in the FS.

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From: Hagerman, Paul
Sent: Wednesday, August 30, 2017 4:04 PM
To: 'Donovan, Betsy' <Donovan.Betsy@epa.gov>; Darpinian, Amy F NWK (Amy.F.Darpinian@usace.army.mil) <Amy.F.Darpinian@usace.army.mil>
Subject: RE: Rolling Knolls - proposed agenda for August 31 meeting

Betsy –

We added a column to the PRPs table, and added our response to their responses. In most cases, we are ok with their response or suggested approach. If you'd like, we can talk today, we should be here until 5:30.

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From: Donovan, Betsy [mailto:Donovan.Betsy@epa.gov]
Sent: Tuesday, August 29, 2017 5:35 PM
To: Hagerman, Paul <HagermanPR@cdmsmith.com>; Darpinian, Amy F NWK (Amy.F.Darpinian@usace.army.mil) <Amy.F.Darpinian@usace.army.mil>; Jill McKenzie (Jill.McKenzie@dep.nj.gov) <Jill.McKenzie@dep.nj.gov>; Fajardo, Juan <Fajardo.Juan@epa.gov>; Sivak, Michael <Sivak.Michael@epa.gov>; George Molnar (George_Molnar@fws.gov) <George_Molnar@fws.gov>
Subject: FW: Rolling Knolls - proposed agenda for August 31 meeting

FYI and just in case this didn't make it to you while I was out.

From: John Persico [mailto:JPersico@Geosyntec.com]
Sent: Thursday, August 24, 2017 4:45 PM
To: Vaughn, Stephanie <Vaughn.Stephanie@epa.gov>; Kaur, Supinderjit <Kaur.Supinderjit@epa.gov>; Donovan, Betsy <Donovan.Betsy@epa.gov>
Cc: Jessica M. Evans <JMEvans@Geosyntec.com>; Ricci, Richard F. <RRicci@lowenstein.com>; mfaigen@issuesllc.com; 'Fisher, Gary (Nokia - US/Murray Hill)' <gary.fisher@nokia.com>; 'Richman-La Londe, Alexa' <ALALONDE@RIKER.com>;

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Subject: Rolling Knolls - proposed agenda for August 31 meeting

Betsy and Stephanie – this email provides a proposed agenda for the upcoming meeting on August 31. I have also attached the USEPA comments we want to discuss, with preliminary responses or questions from the PRP Group.

Proposed Agenda

1. Discussion of USEPA Comments on the Revised Remedial Investigation Report (April 2017)
    - General Comments
        - Comments 1, 19, 20, 21, 25, 26, 27, 30, 31, and 39 – meaning and applicability of delineation in the RIR; discussion of "areas of particular concern" and "potential source areas;" use of these concepts in the FS rather than the RIR.
        - Comments 2, 23, 24, and 28 – use of Background Threshold Values.
        - Comment 12 – request clarification as to why USEPA is requesting this change
        - Comments 14, 28, 29, 32, and 38 – request clarification as to what USEPA is asking for in these comments.
        - Comment 20 – no evidence of spent granular activated carbon at test pit TP-09.
        - Comment 36 – comparison of soil data to IGWSSLs in the FS.
        - Comment 41 – conclusion is valid based on the data and should remain in the text.

    - Specific Comments
        - Comments 35 and 43 – question whether the information requested is relevant to the Executive Summary; it does not seem at a high enough level for the Executive Summary.
        - Comments 64, 68, 73, and 97 – USEPA to verify our responses.
        - Comments 79 and 82 – delineation of the landfill boundary.
        - Comments 84, 87, 92, 116, 130, 134, 173, and 196 – these comments request additional text to discuss various aspects of the site hydrogeology, contaminant distribution, and other issues. However, these data are already discussed fully in the text. Additional discussion will become speculative or repetitive.
        - Comment 102 – the samples are from 2007 and these data were included in the 2012 SCSR with no comment by USEPA. Finding out why they were reanalyzed would require a data validator to review the old lab reports. Other than adding one sentence to the RIR to state why they were reanalyzed, there will be no valuable addition to the RIR.
        - Comment 197 – was addressed in Section 4.5.4 of the April 2017 Revised RIR.

2. Application of ARSs to Define Remediation Areas in the Feasibility Study
    - Use of Compliance Averaging
    - Averaging for PCB data

3. Overall Project Direction

4. Schedule – deliverables leading to the ROD

We look forward to speaking with you on the 31st.

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